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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDWARD WHEELER, an individual,

Plaintiff,

vs.

CITY OF HENDERSON, a Nevada
Municipal Corporation; CITY OF NORTH
LAS VEGAS, Nevada, a Municipal
Corporation, SERGEANT TRAVIS
SNYDER, individually and in his official
capacity as a North Las Vegas Police
Officer,

Defendants.

CASE NO. 2:15-cv-1772-JCM-CWH

**STIPULATION AND ORDER TO
STAY DISCOVERY PENDING THE
OUTCOME OF PRIVATE
MEDIATION**

COME NOW, Plaintiff EDWARD WHEELER, Defendants CITY OF NORTH
LAS VEGAS and SERGEANT TRAVIS SNYDER (collectively referred to as “the NLV
Defendants”) and Defendant CITY OF HENDERSON, (collectively referred to as “the COH
Defendants”) by and through their respective counsel or record and hereby stipulate and
make joint application to stay discovery in this matter until such time as the parties conclude
a mediation that the NLV Defendants and Plaintiff have agreed. The current discovery cutoff
is December 4, 2018.

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1 Good cause exists to stay discovery in this matter. Specifically, **Plaintiff and the**
2 **NLV Defendants have scheduled a mediation for March 8, 2019.** The stay of discovery
3 will allow the NLV Defendants and Plaintiff to explore the possibility of settlement through
4 mediation without incurring the time and expense of ongoing discovery prior to the
5 mediation.

6 Additionally, Plaintiff and Defendant the City of Henderson have reached a
7 settlement, which just needs to be memorialized in writing.

8 Within thirty (30) days after completion of the mediation the NLV Defendants and
9 Plaintiff will submit a Stipulation and Order reflecting resolution of some or all of the claims
10 and/or advise the Court that the parties were unable to resolve the claims and will submit
11 new discovery deadlines, including the discovery cutoff deadline (providing ample time to
12 complete written discovery and depositions), deadline for filing dispositive motions and the
13 deadline for filing the Joint Pretrial Order.

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1 IT IS SO STIPULATED.

2 DATED this 29th day of November, 2018.

DATED this 29th day of November, 2018.

3 **CITY OF HENDERSON**

MCLETCHIE LAW

4 /s/ Nancy D. Savage

/s/ Margaret A. McLetchie

5 Nicholas Vaskov, City Attorney

Margaret A. McLetchie, NBN 10931

6 Nancy D. Savage, NBN 392

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9 *Attorneys for Defendant, City of Henderson*

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Las Vegas, NV 89145

Attorneys for Plaintiff, Edward Wheeler

12 DATED this 29th day of November, 2018.

13 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

14 /s/ Robert W. Freeman, Jr.

15 Robert W. Freeman, Jr., NBN 3062

16 6385 S. Rainbow Boulevard, Suite 600

17 Las Vegas, Nevada 89118

18 *Attorney for Defendants, City of North Las Vegas*

and Sergeant Travis Snyder

19 **ORDER**

21 IT IS SO ORDERED.

22 DATED November 30, 2018

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26 U.S. DISTRICT MAGISTRATE JUDGE
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